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ON
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket No. 92-115

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REPLY COMMENTS

In-Flight Phone Corporation ("In-Flight") opposes the proposal of Claircom Communications Group, L.P. ("Claircom") to change Section 22.861(a) in order to increase the maximum power of

received at -130 dBm at any ground station receiver,^{2/} the emission received in second and higher adjacent channels at ground station receivers would be an intolerably noisy -146 dBm.^{3/} The aggregate noise would worsen as the air-ground service matures and all air-ground channels are regularly used. For instance, if transmitters were operating on Channels 1-13 and 17-29 at the 46 dB standard proposed by Claircom, the noise level received in Channel 15 (for which Channels 1-13 and 17-29 are second and higher adjacent channels) would be as high as -132 dBm. This would be particularly harmful when the received power level of communications on Channel 15 is near the -115 dBm power threshold used under the channel sharing procedures to signify that a channel is in use. In this circumstance, the carrier/interference ("C/I") ratio in Channel 15 would be 17 dB and digital receivers would be unable to pick up portions of the communication. The current 50 dB standard, by contrast, ensures that calls near or at the threshold are of usable quality by guaranteeing a C/I ratio of 21 dB in this situation.


^{2/}See Section 22.861(b).

^{3/}Adoption of Claircom's proposal also would permit air-ground licensees to violate Section 22.861(b). That section restricts second or higher adjacent channel emissions from airborne transmitters to -148 dBm at ground station receivers.

For this reason, In-Flight opposes Claircom's proposal and requests that Section 22.861(a) be adopted as the FCC has proposed.

Respectfully submitted,

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